

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-CV-203-JRG
)	
MICRON TECHNOLOGY, INC.,)	JURY TRIAL DEMANDED
MICRON SEMICONDUCTOR)	
PRODUCTS, INC., AND MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST INC.'S
OPPOSED MOTION FOR LEAVE TO FILE A SECOND AMENDED
COMPLAINT**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposed Motion for Leave to File a Second Amended Complaint. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is true and correct copy Netlist’s Second Amended Complaint.

3. Attached as **Exhibit 2** is a true and correct copy of a redline showing the proposed changes in Netlist’s Second Amended Complaint as compared to Netlist’s First Amended Complaint (Dkt. 70).

4. Attached as **Exhibit 3** is a true and correct copy of Netlist’s First Set of Interrogatories to Defendants (Nos. 1-23) dated on January 11, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of email correspondence from Netlist counsel to Micron counsel dated on July 21, 2023 and July 26, 2023.

6. Attached as **Exhibit 5** is a true and correct copy of an excerpt of Micron’s Second Supplemental Responses and Objections to Netlist’s First Set of Interrogatories and Exhibits Attached thereto dated on June 23, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of Netlist’s Email Custodian and Production Requests dated on June 30, 2023.

Executed on July 28, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby